

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

The government proposes to prove the following statutory factors pursuant to Title 18, United States Code, Sections 3591(a)(2) and 3592(c) as charged in the Superseding Indictment's Notice of Special Findings, hereby incorporated by reference, and non-statutory factors pursuant to Title 18, United States Code, Section 3593(a)(2), as justifying a sentence of death.

COUNT THIRTEEN

**CONSPIRACY TO USE INTERSTATE COMMERCE FACILITIES
IN THE COMMISSION OF MURDER FOR HIRE**

COUNT FOURTEEN

**USE OF INTERSTATE COMMERCE FACILITIES
IN THE COMMISSION OF MURDER FOR HIRE**

COUNT FIFTEEN

MURDER, TAMPERING WITH A WITNESS, VICTIM OR AN INFORMANT

**A. Applicable Statutory Proportionality Factor Under Title 18,
United States Code, Section 3591(a)(2)(C).**

1. The defendant, Maurice Phillips, being at the time over 18 years of age, intentionally participated in an act, contemplating that the life of a person would be taken, or intending that lethal force would be used in connection with another person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).

**B. Statutory Aggravating Factors Enumerated Under Title 18,
United States Code, Section 3592(c).**

1. **Procurement Of Offense By Payment.** The defendant, Maurice Phillips, procured the commission of the offense, that is, the murder of Chineta Glanville, by payment, or promise of payment, of anything of pecuniary value (Title 18, United States Code, Section

3592(c)(7)).

2. **Substantial Planning And Premeditation.** The defendant, Maurice Phillips, committed the offense after substantial planning and premeditation to cause the death of a person, that is, Chineta Glanville (Title 18, United States Code, Section 3592(c)(9)).

C. **Non-statutory Aggravating Factors Under Title 18, United States Code, Section 3593(a)(2).**

1. **Participation In Additional Uncharged Murders, Attempted Murders, Or Other Serious Acts Of Violence.** The defendant, Maurice Phillips, participated in an attempted murder and other serious acts of violence, in that, he either shot a person, or arranged to have a person shot, and also alone, or in concert with others, participated in, contemplated, arranged or attempted to arrange, other assaultive behavior to settle business or other disputes.

2. **Obstruction Of Justice.** The defendant, Maurice Phillips, procured the murder of victim Chineta Glanville, in order to prevent her from continuing to cooperate with law enforcement's criminal investigation of Phillips, and also implicitly or explicitly threatened harm to others whom he believed contemplated cooperating with law enforcement against him.

3. **Future Dangerousness Of The Defendant.** The defendant, Maurice Phillips, a multimillionaire, much of whose illegally obtained assets have not been recovered by law enforcement, is likely to commit, or procure the commission of, retaliatory and other criminal acts of violence in the future, which acts would be a continuing and serious threat to the lives and safety of others. In addition, he has demonstrated low rehabilitative potential, and/or has demonstrated a lack of remorse.

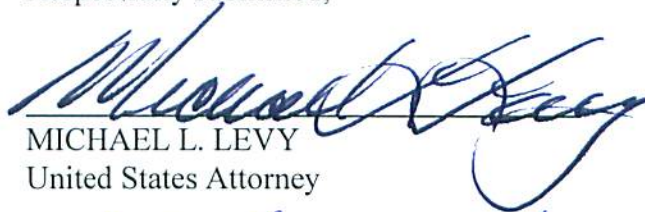
4. **Contemporaneous Conviction For Another Killing.** The defendant, Maurice

Phillips, also participated in the killing of Dane King and is subject to a contemporaneous conviction, as part of this case, for that killing, as charged in Count Thirteen and Count Fourteen of the Superseding Indictment.

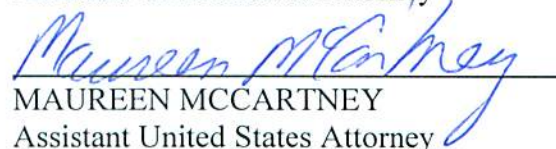
5. **Contemporaneous Conviction For A Serious Federal Drug Offense.** The defendant, Maurice Phillips, as part of this case, is subject to a contemporaneous conviction for violating Title II of the Comprehensive Drug Abuse and Prevention and Control Act of 1970 for which a sentence of five or more years may be imposed, as charged in Count One and Count Two of the Superseding Indictment.

6. **Victim Impact Evidence.** The defendant, Maurice Phillips' participation in the murders of Chineta Glanville and Dane King, has caused injury, harm, and loss to the victims, and to the victims' families because of the victims' personal characteristics and their potential as individual human beings and the consequent impact of their deaths upon their families. The murders of Chineta Glanville and Dane King have caused their families extreme emotional suffering, and irreparable harm.

Respectfully submitted,


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CERTIFICATE OF SERVICE

I certify that on this day, a copy of the Government's Notice of Intent to Seek the Death Penalty has been served upon defense counsel by electronic filing with the Clerk of Court and by regular mail as follows:

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/s/Linwood C. Wright, Jr.

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